

1 Address: Jacqueline Williams
 2 1301 Clay Street, #72372, Oakland, Ca. 94612
 3 Phone Number: (510) 253-5565
 4 Fax Number: _____
 5 E-mail Address: _____

FILEDMAY 06 2019 *or*

SUSAN Y. SOONG
 CLERK, U.S. DISTRICT COURT
 NORTH DISTRICT OF CALIFORNIA
 OAKLAND OFFICE

Pro Se Plaintiff

United States District Court
 Northern District of California

Jacqueline Williams

Case Number:

C19-2440

Plaintiff(s),

vs.

Alameda County Social Services Agency

**COMPLAINT Titles I and V of the
American Disabilities****Willful Misconduct****Oppression**

DEMAND FOR JURY TRIAL

Yes ☒ No ☐

Defendant(s).

1. Parties in this Complaint

a. **Plaintiff(s).** Write your name, address, and phone number. If there are other
 plaintiffs, use more pages to include their names, addresses, and phone numbers.

Name: Jacqueline Williams

Address: 1301 Clay Street, #72372 Oakland, Ca. 94612

Phone number: (510) 253-5565

b. **Defendant(s).** Write the full name and address of every defendant. If the
 defendant is a corporation, write the state where it is incorporated and the state where it has its
 main place of business. Use more pages if you need to.

COMPLAINT

PAGE 1 OF 6 [JDC TEMPLATE]

Defendant 1: Alameda County Social Services Agency

Address: 1515 Clay Street, Ste; 500 8th floor Oakland, Ca. 946112

Phone number: (510) 622-2602

Defendant 2: Luna Chuon, Social Services Agency, Oakland

Address:

Phone number:

Defendant 3: VDIS, Alameda social Services Agency, Oakland

Address:

Phone number:

Defendant 4:

Address:

Phone number:

Jurisdiction

2. My case belongs in federal court under federal question jurisdiction because it is about federal law(s) or right(s) . . .

My case belongs in federal court under diversity jurisdiction because none of the plaintiffs live in the same state as any of the defendants and the amount of damages is more than \$75,000.

Venue

3. Venue is appropriate in this Court because: *1) All defendants live in California AND at least one of the defendants lives in this district; OR 2) A substantial part of the events you are suing about happened in this district; OR 3) A substantial part of the property that you are suing about is located in this district; OR 4) You are suing the U.S. government or a federal agency or official in their official capacities and you live in this district.*

Intradistrict Assignment

4. This lawsuit should be assigned to the San Francisco/Oakland Division of this Court because a substantial part of the events I am suing about happened in this district.

Statement of Facts and Claims

COMPLAINT

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- 1 5. On and about January of 2019; plaintiff file for hearing concerning food stamp and
2 why Alameda took sixty dollars of Cal-fresh and no one response. Plaintiff ask for
3 another hearing and hearing was granted; plaintiff fax more information to State of
4 State-Health & Human Services Agency; Department of Social Services, State
5 Hearing Division in Sacramento February 12, 2019 to show just ignorance VDIS was
6 or whoever was using defendant name! Plaintiff received letter stated that plaintiff
7 cancel the hearing; plaintiff recollection never cancels the State hearing and plaintiff
8 was very clear.
- 9 6. Plaintiff will keep it real and address racist concern; when it comes to the State of
10 California "Hire Help" who call themselves Administrative Law Judge. who have
11 and show malfunction? With attitude toward African-American there nothing
12 stupid nor ignorance about this African-American trust.
- 13 7. On and about April of 2019 plaintiff call the Department of Social Services and
14 ask for hearing over the telephone and received denied letter. Plaintiff informs the
15 defendant try to explain why plaintiff wanted hearing. The defendant was rude and
16 cruel and refused to do intake over the telephone. Plaintiff inform the defendant
17 that plaintiff just had another major surgery and the first surgery was February 25,
18 2019 and the second was March 29, 2019 and plaintiff could not see that well.
19 Defendant put the plaintiff on hold and return and took the intake over the
20 telephone.
- 21 8. Plaintiff appointment was on and about April 29, 2019 section 15015 of regulation
22 mean submission of medical claim bill by electronic plaintiff claim was reject that
23 day. Plaintiff has another appointment May 14, 2019 and plaintiff cannot see
24 doctor who did the surgery on plaintiff left eye! plaintiff is very upset with the
25 repeatedly racist profile by the defendant(s) Alameda County Social Service
26 Agency and State of California regulation and the defendant abusive of power of
27 the law!
- 28

9. Plaintiff already lost sight around in the outside of the eye; plaintiff is stressful and have migraine headache from defendant(s) alameda County Social Services Agency in the treatment of this African-American female. And refused to provide plaintiff with Medical benefits; plaintiff did recertification for Medical and Cal-fresh and any other document information giving Alameda County Social Services Agency at 2000 San Pablo Ave, Oakland, Ca.

10. Plaintiff repeatedly been to Alameda County Social Services and saw several hires helps employees. plaintiff also notices about notorious Defendant(s) do-not like if plaintiff is being obedience toward defendant(s) there always price to paid! Plaintiff call it "Passion of Hatred of Crime."

According **Fair Hearings; Appeals, DHCS**, and entities acting on behalf of States agencies with regard to Medi-Cal eligibility or benefits (including failure to take action) may be appealed by requesting an administrative law hearing (referred to as a "fair Hearing"). 22Cal Code Regs 5095. If benefits have already been terminated, the applicant can request that benefits continue during the appeal process, 42 CFR 431.230(a). Terminated benefits must be reinstated until a hearing decision is rendered if (1) the agency's action occurred without the required advance notice to the applicants. This some of Alameda County Social Services policy for particular race

11. Plaintiff do-not want another hearing after dealing with State of California defendant(s) **"HIRE HELP"** plaintiff felt like it was **LYNCHING PARTY**; plaintiff is aware of lynching plaintiff is from New Orleans and know **about** KKK from the South their sporting activity lynching African-American man! Plaintiff will not drop this case at all and plaintiff will alert other who needs to know what an ongoing problem in California that deal with Mexican that abuse the system and reporting falsifying information to social security and inform plaintiff to contact the agency..

Willful Misconduct

misconduct,” serious and willful misconduct.” “reckless (o wanton) disregard of another’s safety,” and reckless”) includes (1) intentionally acting with knowledge (actual or implied) that serious injury will be the probable (as distinguished from possible) result, or (2) intentionally acting with wanton and reckless disregard of the consequence, Ewing v Cloverleaf Bowl (1978) 20 C3d 389, 402; Williams v. Carr (1968) 68 C2d579, 584.

Oppression

Oppression is “despicable conduct that subjects a person to cruel and unjust hardship in conscious disregard of that person’s right 329(c)(2). Oppression and malice Egan v. Mutual of Omaha Ins. Co (1979) 24 C3d 809, 822

Demand for Relief

Plaintiff respectfully requests the following relief:

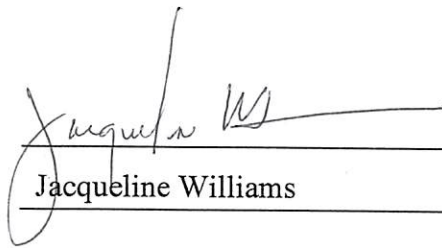
1. Compensatory Damages; \$50,000
2. Oppression Damages \$50,000
3. Punitive Damages: 75,0000
4. Costs and attorneys’ fees as permitted by law;
5. Any other relief the Court deems proper. Paid the Judge and clerk and other in this case for any other per ser!

Demand for Jury Trial

Plaintiff demands a jury trial on all issues.

Date: April 15, 2019

Sign Name:



Print Name:

Jacqueline Williams

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COMPLAINT

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